

FOOD ESTABLISHMENT SANITATION EVALUATION

Evaluation of the
Lincoln-Lancaster County Health Department

October 7-10, 2013

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INTRODUCTION

This food safety program evaluation of the Lincoln-Lancaster County Health Department (hereafter referred to as the Health Department) was performed, as required in the Agreement between the Health Department and the Nebraska Department of Agriculture (NDA), Food Safety and Consumer Protection (hereafter referred to as FSCP). This Agreement states that its purpose "is to provide for the conduct of a cooperative program of inspection and regulation of: food establishments, food processing plants, and salvage operations." FSCP periodically conducts an evaluation of the food inspection program conducted by the Health Department to determine compliance with this Agreement. The last evaluation conducted under this Agreement was in 2009.

A food protection program should be based on uniform, nationally accepted health principles and standards. An evaluation of the program, viewed objectively by the program administrator and staff, can be a useful resource in program maintenance and development. An evaluation can also be helpful in supporting the need for adequate resources to conduct the program effectively and can help in upgrading the qualifications of program personnel.

The purpose of this evaluation is to provide information on the current food sanitation practices observed within a representative number of food establishments in Lancaster County, and to evaluate the current food establishment inspection program conducted by the Health Department.

Prior to conducting this evaluation, Joyce Jensen, R.E.H.S., CP-FS, Environmental Health Supervisor for the Health Department, was notified by George Hanssen, R.E.H.S., Food Safety Administrator for the NDA, that an evaluation would begin during the week of October 7, 2013. The inspection portion of the survey was conducted on October 7, 8, and 10, 2013. The evaluation report was written by Daniel Kahler, R.E.H.S., and the 50 inspections for this evaluation were conducted Mr. Kahler and Marlon Buzek, R.E.H.S. They are both FDA-Certified State Evaluation Officers with FSCP.

Evaluation Methods

"Procedures for Evaluating Retail Food Protection Programs, Recommendations Based on the Food and Drug Administration" was utilized as the basis for performing this evaluation. The method outlined in this resource recommends the Food Code of the U.S. Public Health Service, Food and Drug Administration. The current Nebraska Food Code is based on the 2009 FDA Food Code, and was the legal reference utilized during the evaluation inspections of a randomly selected sample of operating food establishments in Lancaster County.

In selecting a sample of establishments for this evaluation, all restaurants, retail food stores, licensed beverage establishments, bakeries, convenience stores, and caterers operating in Lancaster County and licensed by FSCP comprised the sample base. There were 1,076 of these establishments available for this evaluation. The "Procedures . . ." manual indicates that a maximum of 50 food establishments will be inspected during this evaluation. After a random starting point was chosen to select the first establishment of the sample group, the sample was then selected by a 21-22-21-22 pattern until all 50 establishments had been selected ($1,076/50=21.5$). Each Health Department food inspector had a representative sample drawn from his or her roster of establishments. Six establishments in the original sample roster

required that a substitute establishment be chosen, all due to not being open when an inspection(s) was attempted. The substitute establishments were selected based on similarity with and proximity to the establishment that it was replacing in the sample.

Sanitation Discussion

The Nebraska Food Code utilizes an inspection format that has the inspector notify the person in charge of a food establishment when a specific food safety or sanitation violation(s) is observed during an inspection. The Food Code section in which that violation is identified must also be cited. Inspections of food establishments conducted by public health professionals emphasize the risk factors and public health interventions that the Nebraska Food Code identifies as Priority/Priority Foundation (critical) items. The Food Code identifies a “critical” requirement as “a provision of this Code that, if in noncompliance, is more likely than other violations to contribute to food contamination, illness, or environmental health hazard.”

The following Table lists the establishments inspected for this evaluation, the number of critical and non-critical violations documented during the evaluation inspections, and the number of critical and non-critical violations documented by the Health Department during the last routine inspection of those establishments.

Table I
Establishments

Est. #	Establishment Name	Address	Eval. Inspec. Critical/ Non-Critical	Last Routine Inspec. Critical/ Non-Critical
1	Burger King	5940 Havelock Ave.	2 / 8	1 / 3
2	Russ's Market	6300 Havelock Ave.	7 / 8	6 / 15
3	Scooter's Coffeehouse	2700 Dan Ave.	7 / 8	2 / 3
4	McDonald's	4700 N. 27 th	1 / 5	1 / 5
5	Sam's Club	4900 N. 27 th	2 / 4	3 / 5
6	Rodeway (Victorian) Inn	2801 W. O St.	4 / 1	2 / 6
7	Tina's Café & Catering	616 South St.	5 / 8	1 / 3
8	Open Harvest	1618 South St.	4 / 17	2 / 4
9	Meier's Cork N Bottle	1244 South St.	0 / 6	0 / 1
10	Sugar Plum Candies (substitute for Smoking Gun Jerky)	5500 Old Cheney #21	1 / 2	0 / 2
11	Huhot Mongolian Grill	2525 Pine Lake Rd.	4 / 11	0 / 2
12	Dairy Queen	5545 S. 16 th	6 / 11	0 / 1
13	Tavern on the Square	816 P St.	1 / 3	2 / 5
14	Hampton Inn	7343 Husker Circle	5 / 2	2 / 3
15	Sodexo-Novartis	10401 US Hwy 6	3 / 7	0 / 6
16	U-Stop #4	84 th & Hwy 6	2 / 6	1 / 4
17	Taco John's	2301 N. 84 th	5 / 9	0 / 6
18	Great Wall Chinese Restaurant	Waverly	6 / 14	5 / 6

Est. #	Establishment Name	Address	Eval. Inspec. Critical/ Non-Critical	Last Routine Inspec. Critical/ Non-Critical
19	Easy Eat (substitute for Gratiutes)	1401 N. 56 th	0 / 3	0 / 2
20	El Matador Lounge (substitute for Coyote Willy's)	1620 Cornhusker Hwy.	2 / 7	1 / 3
21	Kwik Shop #634	2940 N. 14 th	0 / 5	4 / 0
22	Nazir Petroleum	2305 R St.	5 / 6	0 / 2
23	Grisanti's	6820 O St.	7 / 15	2 / 8
24	Tandoor (Substitute for Taj Mahal)	3530 Village Dr.	9 / 16	1 / 4
25	Lincoln Espresso	112 S. 16 th	3 / 12	2 / 8
26	Casey's Gen. Store #2971	900 South St.	6 / 7	1 / 5
27	Kentucky Fried Chicken	2748 S. 48 th	5 / 10	1 / 6
28	Pizza Hut	5540 South St.	2 / 6	0 / 0
29	Cherry Berry	7121 Pioneers Blvd.	5 / 2	****
30	U-Stop #15	7100 Pioneers Blvd.	0 / 3	2 / 0
31	Runza	8550 Andematt Dr.	2 / 4	0 / 3
32	Misty's Restaurant	3930 Village Dr.	6 / 11	1 / 5
33	Comfort Suites	331 N. Cotner	5 / 2	0 / 3
34	Staybridge Suites	1501 N. 86 th	4 / 2	1 / 1
35	Kentucky Fried Chicken\Long John Silvers	2221 N. 86 th	2 / 2	1 / 1
36	Family Dollar	2900 N. 70 th	1 / 2	2 / 1
37	Amigo's	2240 N. 48 th	6 / 11	0 / 7
38	Mo Java Café	2649 N. 48 th	1 / 6	4 / 7
39	Domino's Pizza	3500 N. 48 th	0 / 4	1 / 2
40	Wendy's	6835 N. 27 th	1 / 1	1 / 3
41	Burger King	2500 N. 11 th	1 / 2	0 / 4
42	Embassy Suites Hotel	1040 P St.	4 / 6	7 / 6
43	Chipotle Mexican Grill	1317 Q St.	2 / 2	0 / 4
44	Q'doba	211 N. 12 th	2 / 8	3 / 7
45	Cliff's Lounge (substitute for Coco's)	1323 O St.	2 / 2	0 / 4
46	Bagel's & Joe	4701 Old Cheney	5 / 4	0 / 3
47	From Nebraska Gift Shop	803 Q St.	0 / 2	0 / 1
48	Pizza Hut	6414 O St.	1 / 11	1 / 6
49	Hilton Garden Inn Hotel		4 / 3	3 / 5
50	Shogun (Substitute for Tokyo Steak)	3700 S. 9 th	6 / 10	3 / 5
	Average		3.28 / 6.34	1.43 / 4.0

The data indicates that an average of 3.28 critical violations were identified during the evaluation inspections, compared to an average of 1.43 critical violations by the Health Department.

The data also indicates that an average of 6.34 non-critical violations were identified during the evaluation inspections, compared to an average of 4.0 non-critical violations identified by the Health Department during their last regular inspections of these establishments.

Looked at another way, the evaluators documented 229% more critical violations, and 158% more non-critical violations during this evaluation than were documented on the last regular inspections by the Health Department.

It should be recognized that it is important for any regulatory agency to provide the food establishments that we regulate with complete and thorough inspections. An open and honest evaluation of a food facility is a vital component of any successful regulatory program, because it allows for the identification and correction of potentially risky food handling practices or food safety issues, thus lowering the risks to the consumer that are associated with commercial food preparation and service.

The Health Department utilizes a Notice of Violation and a Food Enforcement Notice as principle enforcement tools.

A Notice of Violation (NOV) is used to provide an establishment notification when there are conditions that could lead to a serious violation that could result in a foodborne illness. The establishment is required to submit a written Plan of Action (POA) within seven (7) days identifying what will be done to prevent the violation from reoccurring. If the violation is not corrected on the following inspection a Food Enforcement Notice (FEN) will be issued.

A FEN may be issued as a warning when: at least one critical violation is found that poses an immediate and substantial hazard to public health; a pattern of declining sanitation level and an increase in the number of violations over the last three inspections has occurred; a pattern of repeat non-critical violations related to basic sanitation or cleaning have occurred over the last three inspections and with a supervisor's approval; or at least one violation is found that might pose an imminent and substantial health hazard. The time frame for compliance is no more than five (5) days. A follow-up inspection is then completed within five (5) days and a complete inspection is done again in thirty (30) days.

A FEN is issued as an "immediate suspension" when: the establishment has numerous critical violations and poor sanitation levels: conditions are such that an immediate and substantial health hazard exists: or following up on a FEN and substantial improvement has not been made. An immediate suspension is only issued after receiving the Health Director's approval. In addition to the follow-up inspections and POA, the suspended establishment can't be reopened until it passes a re-inspection and a reinstatement fee is collected.

Inspection records were reviewed for the period including January 1, 2011, through October 6, 2013, to identify enforcement actions taken and in which establishments those enforcement actions had occurred. Since January 2011, nine NOVs were issued and three FENs. The following Table identifies those enforcement actions.

**Table II
Enforcement Inspections**

Establishment	NOV or FEN, date issued
Russ's Market	NOV, 6-21-2013
Sam's Club	NOV, 10-20-2011
Open Harvest	NOV, 8-9-2011
Meir's Cork N Bottle	NOV, 10-10-2012 & 11-13-2012
Tavern on the Square	NOV, 7-30-2012
Hampton Inn	NOV, 9-6-2012
U Stop	FEN, 2-3-2012
Kwik Shop	NOV, 8-3-2011 & 1-16-2013
Grisanti's	FEN, 12-28-2011 & 4-27-2012

Table III identifies specific items (by Food Code reference) that the Food Code identifies as critical items that were documented as violations during the evaluation. It also indicates those critical violations documented during the last regular inspections of these same establishments by Health Department inspectors, as well as the total number documented by the evaluators and the Health Department.

**Table III
Critical Violations**

	Evaluation Critical Violations	Last Route Inspection Critical Violations
2-301.14	3	0
3-202.15	4	1
3-302.11	1	3
3-306.11	4	0
3-402.12	1	0
81-2,271.01	12	4
81-2,272.10	0	1
81-2,272.24	3	6
81-2,272.25	2	0
81-2,272.27	1	0
3-501.14	1	1
3-603.11	1	0
4-101.11	1	0
4-302.14	6	4
4-501.110	2	0
4-501.112	1	0
4-501.114	3	5
4-502.11	6	2
4-601.11	51	5
4-602.11	5	2
4-702.11	4	0

	Evaluation Critical Violations	Last Route Inspection Critical Violations
5-202.14	5	1
5-203.14	3	4
5-203.15	1	0
5-205.11	4	3
5-205.15	3	0
6-301.11	2	4
6-301.12	8	3
6-501.111	2	2
7-102.11	3	2
7-201.11	14	3
7-202.12	1	0
7-204.11	1	0
7-206.12	0	1
7-207.11	0	1
3-603.11	1	0
3-501.19	2	0
5-202.13	2	0
Critical Violations Total	163	70

As can be seen, the frequency which many of the code references are documented by the Health Department are reasonably close to the frequency those same items were observed during the evaluation. There are a few exceptions, such as 81-2,272.01 (3-501.16), Temperature Control of Temperature Control for Safety Foods; 4-601.11, Food Contact Surfaces, Clean; and 7-201.11, Toxic storage. A stronger emphasis on identifying these food safety issues during routine inspections, as well as documentation on the inspection reports when observed, is recommended.

Table IV identifies specific Food Code references and their explanations as cited by Health Department inspectors, followed by the generally accepted interpretation.

Table IV
Food Code interpretations

Violation Description	Health Department Interpretation	Accepted Interpretation
Open employee drink container in work area	2-401.11*	2-401.11
Improper hot/cold hold temp. for TCS food	3-501.16* **	81-2,272.01*
Unapproved ceiling tile	4-101.19	6-101.11
Can opener blade is cutting metal shavings	4-202.15	4-501.11
Inaccurate food probe thermometer	4-203.11/12	4-501.11*
Food probe thermometer not provided	4-204.112	4-302.12*
Sanitizer test kit not provided	4-302.14	4-302.14*
Sink designated for handwashing not provided	4-501.16	5-204.11*
NO residual sanitizer concentration detected	4-501.114*	4-702.11*
Sanitizer concentration too strong	4-501.114*	7-204.11*
Walls/ceiling in walk-in cooler soiled	4-601.11	6-501.12
Three compartment warewash sink not provided	4-703.11*	4-301.12*

Violation Description	Health Department Interpretation	Accepted Interpretation
Single-service cups over-stacked in dispenser	4-903.11	4-904.11
Date marked RTE food is past use by date	81-2,272.24*	81-2,272.25*
Less than 100F water provided to hand-sink	5-202.12	5-202.12*
	5-202.14	5-202.14*
Hand-sink not accessible	5-205.11	5-205.11*
Hand soap not provided at hand sink	6-301.11	6-301.11*
Sanitary towels/hand drying device not provided at hand sink	6-301.12	6-301.12*
Toxic item improperly stored	7-201.11	7-201.11*

* Indicates a critical violation

** This item was replaced by 81.2,272.01 in the 2009 Code.

The Agreement between the Health Department and FSCP states that “each Health Department environmental health specialist performing inspections of establishments regulated under this Agreement shall be standardized in food interpretations at least once every four years.” The standardization process is a useful tool to help maintain an acceptable level of consistency for inspectors within an agency, as well as between other regulatory agencies in Nebraska.

The Health Department has assigned Paul Drotzmann as their Training and Standardization Coordinator. Mr. Drotzmann is standardized by FSCP. He has standardized all of the Health Department food inspection staff within the last four years.

Table V identifies those establishments included in this survey that were not inspected by the Health Department within the required time interval from the preceding routine inspection.

Table V
Inspection Frequency

Inspection Interval	Establishment	Inspection Dates	
180	Russ's Market	11-20-2012	6-21-2013
365	Tavern on the Square	7-30-2012	8-12-2013
180	Tina's Café	2-24-2012	9-15-2012 5-3-2013
180	Sodexo-Novartis	4-18-2012	11-1-2012
270	Taco John's #9965	6-14-2012	4-4-2013
270	Casey's Gen. Store	8-27-2012	6-17-2013
270	Pizza Hut #010793	7-25-2012	5-16-2013
270	Cherry Berry	10-9-2013**	
180	Kent Fried Chicken-Long John Silvers	1-25-2012	9-17-2012 7-15-2013
270	U Stop #15	7-23-2012	5-6-2013
180	Sho Gun	11-7-2012	7-11-2013

The Nebraska Food Code, 8-401.10, “Establishing Inspection Interval”, allows the Regulatory Authority to establish inspection intervals beyond twice a year. The longer interval may be assigned to a food establishment based on a written risk-based inspection schedule. The Health Department does assign longer inspection intervals, as indicated in the prior Table.

Administrative Discussion and Observations

The Health Department has the authority cited in the Lincoln Municipal Code, 8.20, Lincoln Food Code, as well as the Memorandum of Agreement with FSCP (7/1/13-6/30/14) to conduct inspections and regulate food establishments within the city of Lincoln. They also have the same duties in the communities of Lancaster County outside of Lincoln per the Agreement with the FSCP. The Lincoln Food Code allows the Health Department to deny, suspend or revoke a food permit for violating the provisions of the Code.

The Health Department has adopted the Nebraska Food Code (2005 FDA Food Code, as modified by FSCP). FSCP has since adopted a modified version of the 2009 FDA Food Code. The regulatory standards to be enforced by the Health Department were at least equivalent to State law until the adoption of the 2009 Code by FSCP. This discrepancy becomes most noticeable when it is recognized that numerous Food Code requirements in the latest Code are now designated as critical violations while in the 2005 Code they were non-critical violations.

The requirement that food equipment be NSF certified (or equivalent), the stricter nature of the Lincoln City Plumbing Code, and the requirement that all individuals working in food establishments undergo mandatory training/certification are areas that the Environmental Health Supervisor cites as being above the minimum standards identified in the Nebraska Food Code. Ms. Jensen does not believe that this places additional undue burden on the food industry in Lancaster County. Ms. Jensen also believes that the mandatory training requirements that the Health Department has are an important asset in their overall food safety program.

Ms. Jensen believes that the Health Department has adequate legal tools to enforce safe food handling practices and adequate sanitation levels in the food establishments that they regulate in Lancaster County.

The Health Department issues food permits as required by the Lincoln Food Code, and in most case these are the same types of permits as issued by the FSCP. Food establishments located outside of Lincoln in Lancaster County are not issued Health Department permits. In this case the food establishment operates with a State issued permit, and the Health Department is reimbursed a portion of the annual inspection fee collected by FSCP.

Ms. Jensen believes that her Division has a good working relationship with the various local government agencies to which they share overlapping responsibilities, to include the City Plumbing, Electrical and Mechanical Departments.

The Health Department has 5.8 full time food inspector positions assigned to perform food inspection activities, and has approximately 212 food establishments assigned per FTE.

Each Health Department inspector is responsible for planning their weekly work schedule, aided by an electronic “dashboard” feature on their computer to identify those establishments due for inspection. This information is augmented by special circumstances, such as complaints, liquor requests, change of owners, remodeling, etc.

Health Department inspectors are required to inspect each food establishment assigned to them at least as often as the required inspection interval for that firm.

The Health Department's training and orientation plan for new food inspector hires is defined by Health Department Policy 222.05, which requires 25 inspections where the trainee observes and discusses how the inspection is performed and then 25 additional inspections where a Food Team inspector observes while the trainee conducts the inspection.

Food inspectors receive continuing training through such means as attending the annual NEHA Education Conference, the Nebraska Food Safety Task Force Conference, and any other food safety related training class opportunities when they become available.

Communication between the Environmental Health Supervisor and staff occurs by monthly staff meetings and other meetings as needed. The Health Department Food Safety Policies provide additional guidance (see attached). FSCP provides the Health Department guidance in the form of "F Memos," which address a wide range of policies and interpretations.

The Health Department provides the necessary equipment required by the inspectors to perform their inspection duties. Each field staff member is provided use of a city vehicle, a tablet computer, a cell phone, a maximum registering temperature measuring device, one or more dial/digital temperature measuring devices, and infrared temperature measuring device, a digital camera, a flashlight, sanitizer test kits and alcohol swabs. A foodborne illness food sample kit, hand-held black lights, a microscope, and a pH meter are also available for staff to use as needed.

The Health Department places a strong emphasis on helping to train local food industry personnel. Training to prepare for the examination for a Food Protection Manager Certificate is available from two local sources: Southeast Community College and the University of Nebraska-Lincoln. An ANSI/CFP Food Protection Manager Certificate is required initially to qualify for a Lincoln Food Protection Manager Permit. Many nationally franchised food chains provide in-house manager certification training through accredited providers.

Continuing Education credits are required for food managers to renew their permits. Each year, the Health Department makes available six Food Protection Classes that provide the required CEU's to renew their Lincoln Managers Permit. This class is taught by Dr. Phil Rooney, CP-FS, the Health Department's Food Handler Education Coordinator. Certificates are issued for three years.

Food Handler Training is provided online through the Health Department's Food Safety Program web site or through classes conducted at the Health Department for Serve/Clean, Prep/Cook, and Restricted/Shift Managers. The majority of food handler permits are issued online, but the Health Department does offer a monthly Restricted/Shift Manager class, a monthly Serve/Clean class, a monthly Spanish Prep/Cook class and weekly Prep/Cook classes. Approximately 12 establishments provide their own food handler training under an approved in-service program contract with the Health Department.

Lincoln farmers' market home bakers and processors must attend the Farmers Market Vendor Workshops' Food Safety Training, held once a year, or have a Serve/Clean or higher Food Handler/Manager Permit.

The Health Department has an Environmental Educator assigned to providing food handler education classes, Food Protection Manager permit renewal classes, support for online training,

quarterly Manager Memos to Food Protection managers, as well as updating and maintaining the current Food Program website.

The local food industry and the public are able to share involvement in policy making by representation on the Food Advisory Committee. The Health Department also has a link on their web page to allow the public access to information relating to food safety issues.

The Health Department's Food Section is responsible for investigating suspected outbreaks of foodborne illness. In a food outbreak, the investigation is elevated to the EPI team which includes the Health Department's Epidemiologist, Communicable Disease Program staff, Environmental Public Health Division Manager, Environmental Health Supervisors, and one or more Food Safety Team members. An investigation is based on the recommendations and plan of action from the EPI team.

From January 1 to December 31, 2013, the Health Department received and investigated 80 foodborne illness complaints. A typical year would involve investigating from one to three outbreaks.

OBSERVATIONS

1. The Health Department is using a version of the Nebraska Food Code that has been replaced by FSCP with a more recent version of FDA's Food Code. This is preventing Health Department inspectors from being able to document on their inspection reports certain critical violations identified in the current Nebraska Food Code.
2. The Health Department has an extensive mandatory training requirement for all food employees, not just the Person in Charge of a food establishment. It is this evaluators' belief that since its inception this mandatory training program has had a significant role in the overall improvement in the Health Department's food protection program.
3. The Health Department utilizes enforcement procedures (Notice of Violation, Food Enforcement Notice) that aid their field staff in gaining compliance from food establishments that can't/won't voluntarily comply with food safety issues. In addition through an FDA grant received in 2013, a consultant has been hired to work with poorly performing establishments to try to improve Active Managerial Controls.
4. Several critical Food Code violations have been documented at a much lower frequency than was observed during this evaluation. The most obvious examples were 81-2,272.01, 4-601.11, and 7-201.11, dealing with food temperatures, clean food contact surfaces, and toxic storage respectively. Documentation of most other food code violations is within acceptable norms.
5. Some food establishments are not inspected within the time frame required by Law, or a time frame assigned by the Health Department within the scope of 8-401.10 of the Nebraska Food Code.
6. The Health Department enrolled in the FDA Standards in August 2001. In August 2002, Standard 7 was the only standard the Health Department met at that time. The Health

Department currently meets Standards 1, 2, 3, 4, 5, 7, and 9. The Health Departments' Board of Health has indicated that their goal is for the Food Safety Program to meet all nine Program Standards.

RECOMMENDATIONS

1. Adoption of the current Nebraska Food Code, or an equivalent set of requirements, should be a priority of the Health Department. Many significant changes to food safety requirements occur in the 2009 FDA Food Code that would be helpful to the Health Department in maintaining and improving their food safety program.
2. A stronger inspection emphasis should be placed on those Food Code requirements identified in Observation # 4. Safe food temperatures, clean food contact surfaces, and proper toxic storage within food establishments provides for a safer food establishment. Table III provides more specific information.
3. Inspect all food establishments within the time frame required by law. Table V provides specific information.
4. The mandatory training of food establishment personnel has helped to strengthen the Health Department's food safety program. This evaluator believes that this training component has had a marked effect in improving the Health Departments' food safety program. Continuation of this program is certainly recommended.
5. Use of the available enforcement tools by the food staff, such as the Notice of Violation and the Food Enforcement Notice. The Health Department inspectors are currently using these enforcement tools, and should continue to utilize them as needed/required.
6. Continue progress towards meeting the additional Program Standards requirements identified in Observation #6.